

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Lawrence Lavelle Lyon

Case: 4:21-mj-30375

Judge: Unassigned,

Filed: 08-03-2021 At 04:51 PM

SEALED MATTER (kcm)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 17, 2021 in the county of Genesee in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 922 (g)(1),	Felon in possession of a firearm,
18 U.S.C. § 1951, and	Interference with commerce by threats or violence, and
18 U.S.C. § 924 (c)(1)(A)	Brandishing a firearm during and in relation to a crime of violence

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: August 3, 2021City and state: Flint, Michigan


Complainant's signature

Candace Booth, Special Agent - ATF&E
Printed name and title



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Candace A. Booth being first duly sworn, hereby depose and state as follows:

Introduction

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), currently assigned to the Flint, Michigan, Field Office. I have been an ATF Special Agent since 2009. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a US Border Patrol Agent. I have participated in numerous state and federal investigations including narcotics trafficking, illegal firearms possession, firearms trafficking, shooting investigations, as well as other types of criminal investigations. Because of my involvement in these and other investigations, I have sworn to a number of federal search and arrest warrants.
2. This affidavit is in support of a complaint and arrest warrant for Lawrence Lavelle Lyon, (DOB xx/xx/1987). Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each fact known to me concerning this investigation.
3. ATF is currently conducting a criminal investigation concerning Lawrence Lavelle Lyon for violations of 18 U.S.C. § 922 (g)(1) —felon in possession of a firearm, 18 U.S.C. § 1951- interference with commerce by threats or violence, and 18 U.S.C. § 924 (c)(1)(A)- brandishing a firearm during and in relation to a crime of violence.

4. The facts in this affidavit are based on my personal knowledge and observations, my review of law enforcement reports, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

Probable Cause

5. On July 17, 2021, Flint Police Officer Kelly responded to 1510 E Carpenter RD, Flint, MI 48505 (Dollar General) regarding an armed robbery that had occurred. Upon arrival Officer Kelly conducted an interview with the cashier working at the time of the robbery. Surveillance video was reviewed from both the Dollar General and the nearby Sunoco Gas Station.
6. The cashier and victim of the robbery (Matthews) was interviewed, and the following is a summary of her statements: Matthews advised at 1052 hours, while working the cash register, an unknown black male came to the counter and robbed her at gunpoint. She stated that she rang the male up for a pack of Scott toilet paper and a pack of paper plates. Matthews advised she told the male his total and that's when he removed a pink and black handgun from his pocket and stated "never mind all that, give me all the money and don't call nobody." Matthews stated that she gave the male the money and he ordered her to open the other drawer. Matthews stated that she told the male there wasn't any money in the other drawer. Matthews stated the male then asked whether larger bigger bills were under the drawer, and she stated she lifted the drawer to show the male there wasn't any money underneath it. Matthews stated that the male stood there, counted the money and walked out of the store, unknown direction of travel. Matthews described the male as a black male, mid 20s

to 30 years of age, approximately 6'0, 150 lbs, wearing a navy blue jacket, navy blue face mask, black pants and all white tennis shoes.

7. Officer Kelly made contact with the store manager, who provided the store video surveillance. The video showed a black male fitting the description provided by Matthews enter the store at 1048 hours. The male looked towards the cashier area located to the northeast side of the store. Due to the direction the camera faced, Officer Kelly was unable to see the male's face. The male went to the back of the store, picked up a pack of Scott tissue, then went to another aisle and picked up a package of paper plates. The male then headed towards the front of the store to the cash register. Officer Kelly observed Matthews scan the items, bag them and then tell the male his total. The male was then observed placing his hand inside his right front jacket pocket, removing a small pink and black handgun, and pointing the firearm at Matthews. Matthews then opened the register, removed the money, and gave it to the male. In the video, it appears that the male directed Matthews to give him larger bills, as Matthews stated. Matthews was observed lifting the register drawer and then the male motioned with his hand for Matthews to open the other register. The male put the handgun back in his right front jacket pocket, counted the money he took from Matthews, then placed the money in his right front jacket pocket. The male then walked towards the door and exited at 1052 hours. The video footage showed the male walking out of the store heading west through the lot towards the Sunoco gas station located at 7030 N Dort Hwy.
8. On July 17, 2021, Michigan State Police (MSP) Sgt. Shackelford and MSP Trooper Kane arrived at the Dollar General to follow up with the investigation into the armed robbery. The MSP Troopers contacted

Matthews, whose account of the robbery mirrored her earlier statement to Flint Officer Kelly. Following their interview with Matthews, the MSP Troopers went to the Sunoco gas station just west of the Dollar General to obtain surveillance footage. Surveillance footage was provided to the Troopers by the store employee. The surveillance showed at approximately 1040 hours, the suspect previously described by Matthews could be seen exiting the driver's seat of a silver and gray Chrysler 300 and entering the Sunoco gas station. The suspect allowed other patrons purchase items while he stood in the back of the line. The suspect then tightened his hooded sweatshirt to cover his face. The suspect remained in line momentarily then exited the store without purchasing any items. The suspect then walked around the north side of Sunoco and continued east towards the Dollar General. A brief period of time passed with the suspect inside of the Dollar General before he was seen walking back towards the Sunoco gas station. When the suspect reached the Sunoco parking lot, he began to sprint to his vehicle. The suspect then drove the vehicle onto to Dort Hwy.

9. On July 21, 2021, a suspect in the armed robbery of the Dollar General was identified. MSP Trooper Kane made contact with Flint Police Department (FPD) regarding the utilization of a license plate reader in the area of the armed robbery at the time the robbery occurred. One vehicle matching the suspect vehicle was observed on camera and a license plate was obtained. On the date 7/17/2021, between the timeframe of 1050 hours and 1110 hours, one silver Chrysler 300 was observed. The vehicle had a MI registration plate of EJZ6542. The registered owner of the vehicle was Lawrence Lyon, DOB ***/**/1987, with an address of 6705 Hillcroft Drive, Flint, MI 48505.

10. On July 27, 2021, a state search warrant was executed at the residence of 6705 Hillcroft Drive, Flint, MI. Several items of evidentiary value were located and seized from the southeast bedroom of the residence: a pink and black SCCY, model CPx-2, serial number 940724, 9mm handgun, a blue Nike hooded sweatshirt, black Calvin Klein jeans, white Nike shoes, size 13, and Night Owl surveillance footage from the home surveillance system regarding footage from the day of the armed robbery. In addition to the items seized, the following item was located and photographed but not seized, a prisoner identification card belonging to Lawrence Lyon was located on top of the dresser in the southeast bedroom. Lyon was not present at the residence when the search warrant was executed.
11. During the investigation, I conducted a computerized criminal history check of Lawrence Lyon. The check showed that Lyon had been convicted, in the state of Michigan, of the following felony offenses and is not eligible to possess a firearm under federal law:
 - a. 3/2005- Felony Attempt Motor Vehicle-Unlawful Driving Away for which he was sentenced to one year in the jail;
 - b. 12/2005- Felony Weapons- Carry Concealed, Felony Weapons- Firearms Possession by a Felon for which he was sentenced to 2-7.5 years in prison;
 - c. 12/2011- Felony Controlled Substance-Possess for which he was sentenced to one year in jail;
 - d. 10/2013- Felony Controlled Substance-Del/MFG for which he was sentenced to 13 months to 20 years in prison.
12. On August 3, 2021, I spoke with ATF Special Agent (SA) Kyle McGraw who is a Firearms Interstate Nexus trained Special Agent. From the information provided and based on Special Agent Kyle McGraw's training and experience, the above described SCCY 9mm handgun was

manufactured outside of the state of Michigan, and therefore traveled in or affected interstate or foreign commerce before LYON possessed it. The firearm is also a “firearm” as defined in 18 U.S.C. § 921.

Conclusion

13. Based upon the facts stated above, there is probable cause to believe that on July 17, 2021, in the Eastern District of Michigan, Lawrence Lyon, possessed a firearm after have been convicted of a crime punishable by imprisonment for a term exceeding one year in violation of 18 U.S.C. § 922(g)(1) while committing a robbery in violation of 18 U.S.C. § 1951, and brandished said firearm during and in relation to a crime of violence in violation of 18 U.S.C. § 924 (c)(1)(A).

Respectfully submitted,



Candace A. Booth
Special Agent
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Sworn to before me and signed in my presence
and/or by reliable electronic means on August 3, 2021.



CURTIS IVY, JR.
UNITED STATES MAGISTRATE JUDGE